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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MAR 31 2021

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

UNITED STATES OF AMERICA

v.

DARIUS LAWRENCE YOUNG,
a/k/a "Mup",
CHRISTOPHER ALLEN YOUNG,
a/k/a "40",
ANTHONY ERIK HEBRON,
a/k/a "Pain",
TRAY DAVID SHERMAN,
a/k/a "Racks",
a/k/a "Fat Det", and
LAMAR JAMAL PERKINS,
a/k/a "Lou,"

Defendants

FILED UNDER SEAL

CASE NO. GLS-21-0911

CASE NO. GLS-21-0912

CASE NO. GLS-21-0913

CASE NO. GLS-21-0914

CASE NO. GLS-21-0915

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTS AND ARREST WARRANTS

I, Eric Montgomery, being duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I make this affidavit in support of criminal complaints and arrest warrants. Based on the following facts, there is probable cause to believe that on or about February 3, 2021, in the District of Maryland and elsewhere, **DARIUS LAWRENCE YOUNG, a/k/a "Mup"** ("MUP"), **CHRISTOPHER ALLEN YOUNG, a/k/a "40"** ("YOUNG"), **ANTHONY ERIK HEBRON, a/k/a "Pain"** ("HEBRON"), **TRAY DAVID SHERMAN, a/k/a "Racks," a/k/a "Fat Det"**

(“SHERMAN”), and **LAMAR JAMAL PERKINS, a/k/a “Lou”** (“PERKINS”) conspired to commit a kidnapping, in violation of 18 U.S.C. § 1201(c).

2. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. Your affiant has been a Special Agent of the FBI since May 2008. Your affiant is currently assigned to the Washington Field Office, Safe Streets Task Force, and has been since 2016. Your affiant has drafted dozens of affidavits in support of search warrants that have resulted in the arrests of numerous individuals and the recovery of crucial evidence.

4. Except where otherwise noted, the information set forth in this affidavit has been compiled personally by me, or provided to me, by other law enforcement officers with whom I have spoken or whose reports I have reviewed. Because this affidavit is submitted for the limited purpose of seeking the requested criminal complaints and arrest warrants, I have not set forth each and every fact learned during this investigation.

5. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, that statement is described in substance and is not intended to be a verbatim recitation of such statement. Wherever in this affidavit I quote statements, those quotations have been taken from draft transcripts, which are subject to further revision.

6. Unless otherwise stated, the conclusions and beliefs I express in this affidavit are based on my training, experience, and knowledge of the investigation, and reasonable inferences I have drawn from my training, experience, and knowledge of the investigation.

Probable Cause

February 3, 2021: Kidnapping, Robbery, and Assault

7. According to surveillance footage obtained from the MGM Grand Hotel & Casino (the “MGM Casino”) in National Harbor, Maryland, at approximately 7:30 a.m. on February 3, 2021, **SHERMAN** and **HEBRON** and a light skinned Middle Eastern male (“Victim”) were observed walking together on the P4 level of the MGM Casino parking garage in Oxon Hill, Maryland. The surveillance footage further shows the three men walking toward a black sedan parked in the garage. Moments later, on another MGM Casino security camera, a black Mercedes Benz sedan with a partially cracked windshield and a damaged front grill (“**SHERMAN**’s Mercedes Benz”) is observed driving through the same parking garage. According to MGM Casino’s surveillance footage, **SHERMAN**’s Mercedes Benz exited the MGM Casino’s parking garage at approximately 7:32 a.m.

8. At approximately 7:41 a.m., on February 3, 2021, **SHERMAN**’s Mercedes Benz registered on the Prince George’s County, Maryland, License Plate Reader (“LPR”) system on the National Harbor Outbound camera. This camera is near the MGM Casino and is located along the primary egress route from the MGM Casino.

9. At approximately 7:54 a.m., on February 3, 2021, **SHERMAN**’s Mercedes Benz was seen on surveillance footage at District Wharf, a commercial waterfront area in Washington, D.C. The surveillance footage shows **SHERMAN**’s Mercedes Benz pull up and park in front of a certain address in Washington, D.C. The surveillance footage shows the Victim exit **SHERMAN**’s Mercedes Benz from the rear passenger door and **SHERMAN** exit the driver’s side of his Mercedes Benz. The Victim briefly enters the commercial business at the certain address in Washington, D.C., and then walks toward another nearby commercial business. The Victim is seen

meeting with an unknown male and they appear to give each other something. At approximately 7:59 a.m., the Victim then entered the rear passenger side door of **SHERMAN**'s Mercedes Benz and **SHERMAN**'s Mercedes Benz leaves the area.

10. At approximately 8:12 a.m., on February 3, 2021, **HEBRON** (using a phone number subscribed to him) called **YOUNG** (using a number law enforcement knows to be used by **YOUNG**). The call lasted for 58 seconds.

11. Approximately a minute later, at 8:13 a.m., **MUP** received an incoming call from **YOUNG** on (301) 732-0933. The call was intercepted pursuant to a federal wiretap order. The following is a preliminary and partial transcript of the pertinent intercepted conversation (session #0024):

YOUNG: *Hello?*

MUP: *Yeah?*

YOUNG: *Hey you got some gloves in there?*

MUP: *What kind?*

YOUNG: *Any kind, like I'm trying--, I need the work gloves.*

MUP: *No, I ain't got them.*

YOUNG: *Man, [UI]⁵ you got some latex?*

MUP: *Nah. Hold on, I think mom got some in her room.*

YOUNG: *Nah man, I'm about to stop at the store. Alright. I might a, uh, go, uh, [UI] something with, uh, "Pain" and "Racks." They already snatched a nigga and all that, I just got [UI].*

[Break]

YOUNG: *... matter of fact, this is what I want you do. Hold on, shit. 'Cause I don't, I, I want to leave my car in front of the house, but I don't want to really put on camera getting in the car [UI]*

⁵ "UI" stands for unintelligible.

MUP: *Fuck no! Don't put your car on no camera!*

YOUNG: *Huh?*

MUP: *Unless you motherfucking change the tags.*

YOUNG: *Man, change tags? I ain't got no time for that, man. Put your clothes on.*

MUP: *Shit, ain't nothing!*

YOUNG: *Huh?*

MUP: *That shit don't take no time.*

YOUNG: *Man, fuck all that. They ready now and they already got the nigga. What part don't you understand?*

MUP: *Well, don't put your car on no camera, what the fuck is you talking about? I'm trying to tell you, that shit ain't going to take no--, no, man...*

YOUNG: *[talking at the same time] No, man, I was about to tell you, listen...*

MUP: *...that shit don't take nothing but a few seconds.*

YOUNG: *Man, I was about to tell your ass, look, you can, mother fucking, put your clothes on, right? And, mother fucking, you going to pull off with me, and I'm going to just meet them off camera somewhere. 'Cause, I, I, they going to know my car regardless, pulling it in the circle. I don't know if these niggas got the nigga's head down or nothing. You know what I'm saying?*

[Break]

YOUNG: *Yeah, I'm about to, uh, come up there in a minute.*

[Break]

MUP: *How far is you away?*

YOUNG: *Hello, let me call you right back.*

[Call ended.]

12. At approximately 8:15 a.m. and 8:16 a.m., there are two calls between **HEBRON** and **YOUNG**. The calls last approximately one minute each.

13. At approximately 8:19 a.m., **MUP** received another incoming call from **YOUNG**. The following is a preliminary and partial transcript of the pertinent intercepted conversation (session #0028):

MUP: *Yeah?*

YOUNG: *Hey, I'm about to try to put you on the joint.*

MUP: *On what?*

YOUNG: *The move.*

MUP: *Where you at now?*

YOUNG: *Man, --*

MUP: *So, get ready?*

YOUNG: *Yeah, try to get ready, I'm about to see you know.*

MUP: *Let me know before, so I come out.*

[Call ended.]

14. At approximately 8:20 a.m., **YOUNG** called **HEBRON**. The call lasted for approximately one minute and thirty-two seconds.

15. A minute later, at 8:21 a.m., **MUP** received another incoming call from **YOUNG**. The following is a preliminary and partial transcript of the pertinent intercepted conversation (session #0032):

MUP: *Hello?*

YOUNG: *Hey, hurry, bro. I'm coming up the hill, man. Hurry up. Just throw whatever you have on, on. You don't got no--, and get any kind of gloves, bro, 'cause all we got to do is sit in the car with the nigga while they search the house.*

MUP: *Alright.*

YOUNG: *And, mother fucking, hurry up, bro. I'm coming up the hill, literally. They're ready.*

MUP: *Alright.*

YOUNG: *That mother fucking, uh, and I was about to say, make sure you got some gloves on, or at least some socks.*

MUP: *Alright. Do you got gloves?*

YOUNG: *I got gloves, I just stop--. I just thought about this shit, but they're saying they ain't got no zip ties or nothing. If the nigga gets feisty, I don't want to have to crush him.*

MUP: *Yeah, and might as well not touch nothing, just in case it's got to go to this.*

YOUNG: *But, the thing about it, me and you going to get less than a break down than them. Right? They going to break me down an equal share and I told them I'd break you something.*

MUP: *Alright.*

YOUNG: *'Cause, I don't know how much, I don't give a fuck [UI] we going to get back. We ain't doing shit anyway, you hear me?*

MUP: *Yeah.*

YOUNG: *We're just riding along. Alright. I'm about to, uh, you ready? You coming outside?*

MUP: *Yeah, I just got put on my mother fucking socks on.*

YOUNG: *Alright, hurry up. 'Cause I'm about to tell them niggas, man I'm probably [UI] walk to [UI].*

MUP: *Alright, I got my gloves too, and I got my ski mask.*

YOUNG: *Alright, come on, hurry up, bro. I'm outside.*

[Call ended.]

16. Your affiant believes that in the above series of conversations, **YOUNG** called **MUP** to alert him of a money-making opportunity that involved a kidnapping and robbery of an individual. In session #0024, **YOUNG** explained that, "...Pain and Racks. They already snatched a nigga..." Law enforcement knows "Pain" is a nickname for **HEBRON** and "Racks" is a

nickname for **SHERMAN**. **YOUNG** went on to express concerns about his car being seen by a surveillance camera in the “circle” (a nickname for the cul-de-sac in the 600 block of 46th Place SE, Washington, D.C.). **MUP** replied, “*Fuck no! Don’t put your car on no camera...Unless you motherfucking change the tags.*” **YOUNG** did not want to risk the possibility of the Victim seeing his car. **YOUNG** explained that he did not have much information about how the Victim was being transported. **YOUNG** said, “*I don’t know if these niggas got the nigga’s head down or nothing.*” Your affiant believes **YOUNG** was saying that he did not know whether the kidnappers had put the Victim’s head down and was unsure whether the Victim could see where they were taking him.

17. In session #0028, **YOUNG** invited **MUP** into the kidnapping conspiracy by saying “*Hey, I’m about to try to put you on the joint.*” **MUP** eagerly replied, “*So get ready?*,” asking **YOUNG** if he (**MUP**) should start getting ready now.

18. In session #0032, **YOUNG** told **MUP** that he (**YOUNG**) was almost to **MUP**’s house and told him to “*hurry up. Just throw whatever you have on on.*” **YOUNG** also advised **MUP** to “*grab a pair of gloves*” quickly because they (**YOUNG** and **MUP**) would be sitting in a car with the kidnapping Victim while other subjects robbed the Victim’s residence. **YOUNG** explained this when he said, “*all we got to do is sit in the car with the nigga while they search the house.*” **MUP** replied, “*Alright, I got my gloves too, and I got my ski mask,*” which clearly demonstrated **MUP**’s desire to participate in the crime and to conceal his identity from the victim and/or onlookers. Ski masks and gloves are commonly used by individuals committing crimes in order to hide their identity and reduce the chance of leaving forensic evidence at the crime scene.

19. In the same call (session #0032), **YOUNG** talked about the financial arrangement, or the “*break down.*” **YOUNG** explained to **MUP** that the individuals committing the crime would split the proceeds of the robbery. When **YOUNG** told **MUP**, “*they going to break me down an*

equal share and I told them I'd break you something," **YOUNG** was explaining that he (**YOUNG**) would pay **MUP** from **YOUNG**'s share of the proceeds.

20. Between 8:22 a.m. and 8:30 a.m., **YOUNG** called **HEBRON** approximately six times. The calls lasted a total of approximately four minutes and twenty-three seconds.

21. At 8:23 a.m., law enforcement observed a dark colored Infiniti Sports Utility Vehicle, known to law enforcement to be regularly driven by **YOUNG** (hereinafter "**YOUNG**'s Infiniti SUV"), drive into and exit the 600 block of 46th Place, SE, Washington, D.C.

22. At 8:28 a.m., law enforcement observed **YOUNG** and **MUP** walking together on the sidewalk along 46th Place, SE. **MUP** was wearing light colored blue jeans and a white puffy winter jacket. **YOUNG** was wearing all dark clothing. Later, at approximately 8:53 a.m., law enforcement observed **YOUNG**'s Infiniti SUV parked and unoccupied at the corner of 46th Place, SE and G Street, SE, in the immediate vicinity of **MUP**'s residence.

23. At approximately 9:08 a.m., **MUP** placed an outgoing call to **PERKINS**. The following is a preliminary partial transcript of the pertinent intercepted conversation (Session 0034):

MUP: *hey where you at?*

PERKINS: *I am in the trap.*

MUP: *hey watch out for 12, you hear me?*

[Break]

PERKINS: *What you mean?*

MUP: *Nah I just said just let me know if they come in and out of the circle.*

PERKINS: *You said let you know if they is?*

MUP: *ya.*

PERKINS: *So what the fuck am I supposed to do if they is? I don't know [UI] looking for.*

MUP: *Just let me ... Sit the fuck down, alright sit down though*

PERKINS: *What you in the crib?*

MUP: *Naw the high rise jaunt [UI] snatched a nigger Man sit the fuck down.*

PERKINS: *You said you where?*

MUP: *Behind Racks building, all the way in like a lil..*

PERKINS: *A lil room?*

[Break]

PERKINS: *What y'all drove up there or y'all came through the woods?*

MUP: *Woods.*

PERKINS: *Nah y'all good. One of y'all need to go down there and move that car [UI].*

MUP: *Aight.*

PERKINS: *If y'all got y'all car in that back parking lot, somebody need to go down there and hurry up and aide and assist out there [UI]*

24. Your affiant believes in the above conversation, **MUP** placed a call to **PERKINS**, who was acting as a lookout for the individuals involved in the kidnapping. **MUP**, who was in the basement level "boiler room" guarding the kidnapping victim, asks **PERKINS**, "*Where you at?*" **PERKINS** responds, "*I am in the trap.*" **MUP** then says to **PERKINS**, "*Hey watch out for 12 you hear me?*" **PERKINS** responds, "*What you mean?*" **MUP** clarifies "*Nah I just said just let me know if they come in and out of the circle.*" The term "12" is widely known as a slang term for police. Your affiant believes that in this conversation, **MUP** is asking **PERKINS** to be on the lookout for police entering the 600 block of 46th Place south east Washington, D.C. and to let him (**MUP**) know if there is police activity in the 600 block of 46th Place south east Washington, D.C.

25. As the conversation continues, **PERKINS** says to **MUP**, “*What you in the crib?*” **MUP** responds, “*Naw the highrise jaunt [UI] snatched a nigger Man sit the fuck down.*” **PERKINS** then asked **MUP**, “*You said you where?*” **MUP** clarified, “*Behind Racks building, all the way in like a lil..*” **PERKINS** replied “*A lil room?*” Your affiant believes in the above conversation, **MUP** tells **PERKINS** that they kidnapped someone (“*snatched a nigger*”) and they have him in “*the highrise jaunt,*” referring to 600 46th Place south east Washington, D.C., a multi-story apartment building. **MUP** is heard saying, “*Man sit the fuck down*” to the Victim, who **MUP** and **YOUNG** were holding against his will in the “boiler room” of 600 46th Place south east Washington, D.C.

26. As the conversation continues, **PERKINS** asks **MUP**, “*What y’all drove up there or y’all came through the woods?*” **MUP** responds, “*Woods.*” Your affiant believes in that part of the conversation, **MUP** is describing how they got to the location where the Victim was being held against his will. **PERKINS** is familiar with the location because he asks, “*What y’all drove up there or y’all came through the woods?*”

27. At approximately 9:16 a.m., **PERKINS** placed an outgoing call to **MUP**. The following is a preliminary partial transcript of the pertinent intercepted conversation (Session 0035):

MUP: *hello*

PERKINS: *hey ain’t no body comin back there, hey look peep out that door make sure ain’t nobody comin back there, this lil like blue toyota pulled up but I ain’t see get out like they jumped straight out [UI] with an uber eats but I dont see where they go at ? And its facing like [an individual]’s building like towards the playground, but I don’t see aint no body get out that bitch*

MUP: *mmm I dont see nobody either though*

PERKINS: *aight just stay right there for a minute make sure cus I dont see nobody in that mother ain’t nobody do that*

MUP: *aight I'm bout to walk out right quick, nobody shoulda seen us yo, nah I dont see nobody*

28. Your affiant believes in the above conversation, **PERKINS** placed a call to **MUP** to inform him that there may be someone coming towards **MUP**'s location, which is where the Victim was being held. **PERKINS** says, *".... hey look peep out that door make sure ain't nobody comin back there, this lil like blue toyota pulled up but I ain't see get out like they jumped straight out [UI] with an uber eats but I dont see where they go at? And its facing like [an individual]'s building like towards the playground, but I don't see aint no body get out that bitch."* **MUP** responded, *"nobody shoulda seen us yo, nah I dont see nobody."* **MUP** indicated he looked out from his location where **MUP** and **YOUNG** were holding the Victim and didn't see anyone coming toward their location.

29. At approximately 9:31 a.m., **MUP** placed an outgoing call to **PERKINS**. The following is a preliminary partial transcript of the pertinent intercepted conversation (session #0037):

PERKINS: *Hello?*

MUP: *[UI] who up there? Ain't nobody up there?*

PERKINS: *Hey, nah, look. Hey, close that door, bro, 'cause the maintenance nigga walking back there. And it's the nosey nigga, and I don't want him--. Alright, he gone, he going toward the other place, he going toward the back of the old rec, he ain't coming behind that building.*

MUP: *Alright.*

PERKINS: *Just make sure the nigga not yell [UI].*

MUP: *Alright, that's why I want to just gag his ass. He talk too much anyway.*

PERKINS: *Nah, nah, you don't want to do that, bro. Mace his ass or something.*

MUP: *Alright.*

PERKINS: *Yeah, like mace him. Don't stab him. I'm about to come --*

MUP: *No, I said "gag."*

PERKINS: *Gag? What do you mean?*

MUP: *Like, put something in his mouth.*

PERKINS: *Oh yeah, [UI] do. Duct tape that shit.*

30. Your affiant believes in the above conversation, **MUP** placed a call to **PERKINS**, who was acting as a lookout for the individuals involved in the kidnapping. **MUP**, who was in the basement level "boiler room" guarding the kidnapping victim, called **PERKINS** and asked, "*who up there? Ain't nobody up there?*" to see if there was anyone out in the "circle" that could cause them to be caught or identified. **PERKINS** told **MUP** to "*Close that door, brother*" because there was a maintenance worker walking nearby. **PERKINS** also told **MUP** to "*just make sure the nigga not yell,*" meaning to make sure the victim kept quiet so the victim did not draw any unwanted attention. **MUP** answered "*I want to gag his ass. He talk too much anyway,*" which confirms that **MUP** was holding somebody against their will and wanted them to remain quiet. There was apparently some confusion over the term "gagging" and **MUP** explained to **PERKINS** that "gagging" meant to put something in the victim's mouth to keep him quiet. **PERKINS** replied, "*Oh yeah...duct tape that shit,*" suggesting that **MUP** use duct tape over the victim's mouth to keep the victim quiet.

31. At approximately 10:04 a.m., two individuals believed to be **SHERMAN** and **HEBRON**, based on their physical appearances and clothing, are observed on surveillance footage at the MGM Casino, on the same floor as the Victim's hotel room. The two individuals are attempting to conceal their identity and avoid over exposure to the hotel security cameras. At approximately 10:05 a.m., the two individuals appeared to enter a doorway at the end of the

hallway, which is consistent with the location of the Victim's hotel room. At approximately, 10:18 a.m., **SHERMAN** and **HEBRON** appeared to exit from the same hotel room and walk down the hotel hallway. **SHERMAN** was wearing a backpack and **HEBRON** was pulling a roller suitcase behind him. When **SHERMAN** and **HEBRON** were observed in the same hallway at 10:04 a.m., prior to entering the hotel room, they did not have a backpack or roller suitcase in their possession.

32. At 10:44 a.m., **MUP** placed an outgoing call to **PERKINS**. The following is a preliminary partial transcript of the pertinent intercepted conversation (session #0039):

PERKINS: *Hello?*

MUP: *Hey, who out there?*

PERKINS: *Ain't nobody out here.*

MUP: *Alright.*

PERKINS: *I'm saying, like there's people out here. Like [two other individuals], everybody out, [another individual], but there ain't no people out here if you can hurry up and walk from back of there.*

MUP: *Nah, we're going straight through the woods.*

PERKINS: *Oh, you're going straight through the woods? Nah, go ahead and hurry up. There ain't nobody out here.*

MUP: *Alright.*

PERKINS: *You got to hurry up though.*

MUP: *Uh huh.*

[Call ended.]

33. Your affiant believes that in the above conversation, **MUP** called **PERKINS** again to determine who was around and whether it was safe for them to emerge from the location in which they were holding the Victim. **PERKINS** replied, "...there ain't no people out here, if you can hurry up and walk from back of there." **MUP** and **PERKINS** continued to discuss **MUP**'s

exit strategy in order to keep themselves hidden from view. **MUP** explained that he did not intend to walk around to the front of the building but explained “*we’re going straight through the woods.*”

34. At approximately 10:55 a.m., **MUP** placed an outgoing call to **HEBRON**. The following is a preliminary partial transcript of the pertinent intercepted conversation (Session 0041):

MUP: *where y’all at?*

[heavy breathing]

MUP: *where y’all at?*

HEBRON: *y’all cool?*

MUP: *yeah we alright*

HEBRON: *aight where the fuck y’all at?*

MUP: *bout to walk around [UI] like shit*

35. Your affiant believes the above conversation illustrates that **MUP** and **HEBRON** are trying to locate each other and meet up. This is further corroborated when at approximately 10:57 a.m. law enforcement observe **YOUNG** and **MUP** exiting the wood line directly behind the building at 604 46th Place SE, Washington, D.C.

Law Enforcement Locate the Victim

36. At approximately 10:57 a.m., law enforcement arrived in the area of the “circle” and quickly encountered a light skinned Middle Eastern male (the “Victim”) in the 500 block of 46th Street, SE, Washington, D.C. (which is directly behind and to the north of 600-604 46th Place SE). The Victim appeared to look like, and wore the same clothes as, the Middle Eastern man who was observed on the MGM Casino surveillance footage leaving the MGM Casino earlier that morning. The Victim had blood running down the front of his face from the top of his head. The

Victim also appeared to have a cut on his mouth and eye and a broken and swollen nose.

37. The Victim initially told law enforcement that he obtained his injuries from falling on the ice. Later, the Victim stated that he had been at the MGM Casino, but had left the MGM Casino in a black vehicle with two unknown black males. The Victim said he got in the black vehicle with the two unknown black males because one of the black males told the Victim that if the Victim got them cocaine, the black male would pay the Victim and get some women to have sex with the Victim.

38. After leaving the MGM Casino, the Victim and the two unknown black males drove to the District Wharf in Southeast, Washington, D.C., where the Victim's source of cocaine was located. Once at the District Wharf, the Victim said he met with his cocaine source, obtained the ounce of cocaine, and got back in the black vehicle with the two unknown black males. (This is consistent with the surveillance footage mentioned above from the District Wharf.)

39. According to the Victim, after leaving the District Wharf, the black vehicle with the two unknown black males drove to another area in Southeast, D.C., and stopped. The Victim stated that he bent over in his seat to do some cocaine and when he (the Victim) looked back up, the front passenger in the black vehicle put a gun to his face and started to threaten him. At this point two more unknown black males got into the back seat of the black vehicle and sandwiched him in the middle of them. The male to his left had a white puffy jacket on (the same color jacket law enforcement saw **MUP** wearing earlier in the day) and the male to his right was taller, slender, and wearing black cloths. The individual in the white coat had a small Glock pistol. The unknown black males threatened him with the guns and continued to drive the black vehicle around the corner to a parking lot.

40. The Victim stated that the two individuals in the back seat with him held a gun to his lower back after removing him from the black vehicle. They then walked the Victim up a hill, to a maintenance or boiler room of an apartment building where the Victim was physically assaulted, threatened, and held captive. The driver and passenger of the black vehicle stayed in the vehicle and the Victim said they then returned to the MGM Casino to steal all of his belongings from his room. The Victim knew the driver and passenger went to his hotel room because they kept calling the unknown males who were with him, asking for information regarding his (the Victim's) hotel room. The unknown males who were with him would answer the phone and request information from the Victim. At first, the Victim refused, but after they beat the Victim, threatened the Victim's life, and took the Victim's belongings, the Victim gave up. The Victim stated that he gave his captors the code to the safe in his room and the code to his cell phone. During the abduction, the assailants took the Victim's hotel key, watch, wallet, identification, phone, belt, and the ounce of cocaine the Victim had just acquired from his cocaine source. They also pointed a gun at the Victim, placed a gun in the Victim's mouth, and hit the Victim in the face and head with a gun. After a period of time, the assailants left the boiler room and released the Victim.

41. Around the same time law enforcement encountered the Victim (approximately 10:57 a.m.), law enforcement also observed **MUP** (wearing a white puffy jacket) and **YOUNG** walking between the wood line and the back of 600-604 46th Place, SE. **MUP** and **YOUNG** continued to walk on the east side of 46th Street SE in the direction of G Street, SE, before they walked between two buildings and headed toward the 600 block of 46th Place, SE. Moments later,

MUP and **YOUNG** returned to and entered **YOUNG**'s Infiniti SUV, which was parked at the intersection of G Street and 46th Place SE, and departed the area.

Post-Kidnapping Intercepted Calls

42. At approximately 11:00 a.m. the same day (February 3, 2021), **MUP** placed an outgoing call to **HEBRON**. During the call, there are four voices overheard. It is my belief that both phones are on speaker and that on one phone is **MUP** and **YOUNG** (in **YOUNG**'s Infiniti SUV) and on the other phone is **SHERMAN** and **HEBRON** (in **SHERMAN**'s Mercedes Benz). At the beginning of the call, the participants talk about seeing law enforcement in the area of the "circle" (the cul-de-sac in the 600 block of 46th Place, SE, Washington, D.C.). One of the participants said, "*it was the WAVE team*" (meaning the Prince George's County Police Department's Auto Theft Task Force), then the conversation continued as below. The following is a preliminary partial transcript of several pertinent segments of the intercepted conversation (session #0044):

HEBRON: *That's what y'all were supposed to do. You were supposed to told that nigga, "yeah, we got your address, nigga...Y'all supposed to took everything off him --"*

YOUNG: *Hey, Pain, hold, hold! Man, you're talking to a mother fucking vet! [UI], that nigga was scared as shit! I said, "If the police come, or anything come, I got your address. Mom Dukes, your little brother, all them is gone!"*

43. Your affiant believes in the above portion of the conversation, the group discussed how they handled the Victim roughly to dissuade him from going to the police. One of the participants bragged that he was a veteran criminal and he reminded the Victim that they knew his address and would kill the Victim's family members if the Victim went to the police ("*If the police come . . . I got your address . . . all them is gone!*"). The conversation continued, as follows (session #0044):

YOUNG: ...Hey young, you know who I thought he was, bro?

HEBRON: Who?

YOUNG: The other dude, you been telling me about.

HEBRON: Nah, hell, nah! We ain't catching him on no humble like that.

[Break]

SHERMAN: Hey **40**, I ain't gonna lie, bro, this was just like a little, uh, uh, spur of the moment, little sweet lick, bro, that we were just talking like, not passing up no more licks.

44. Your affiant believes in this portion of the call, the participants talk about another potential kidnapping victim that they have been targeting, but one that will be more challenging to abduct. One of the participants says, "*We ain't going to catch him [the more challenging target] on a humble like that,*" meaning, the current kidnapping operation was a spur of the moment decision to take a target of opportunity, but the other target will require more planning. The conversation continued (session #0044):

YOUNG: Hey bro, Allah, he, that nigga told me everything. I said, "young if they find us," I was trying to do the reverse psychology. I was like, man, I said "I see why you so tense—", I said "'cause you know that money in there and when we find out that money in there, you going to die." I said, I said, "don't worry about it." Me and **MUP** was playing good cop bad cop on their ass...I mean good cop, bad robber.

MUP: Uh huh. Hey, **40** was bi-polar. He would be cool with him, then motherfucking do the crazy. He said, **40** told his ass, "When you think of somebody, raise a hand. Other than that, shut the fuck up!"

45. Your affiant believes in this portion of the conversation, **YOUNG** explained how he threatened to kill the Victim if they later found out he was lying ("you know that money in there and when we find out that money in there, you going to die"). Apparently, the Victim told the assailants that there was no money in his hotel safe. **YOUNG** told the Victim that he (the Victim) would die if the others who went back to his MGM Casino hotel room did find money in the safe.

Then **MUP** bragged about how **YOUNG** (“40”) spoke harshly to the Victim while they tried to get him to think of people they could extort, likely by forcing them to pay a ransom (“*When you think of somebody, raise a hand. Other than that shut the fuck up!*”). The conversation continued as they discussed whether to use the credit, debit, and/or gift cards they stole from the Victim (session #0044):

SHERMAN: *I mean if you do it, we got to do it now, we got to hurry up.*

YOUNG: *Yeah, we got to do that shit now. He ain’t got no phone or nothing.*

MUP: *You got--, hey, you can get in his phone right?*

SHERMAN: *I just feel like I’m leaving a paper trail, slim.*

YOUNG: *No, we already left a paper trail by y’all snatching him in your car and me pulling up the way and we holding him captive, that’s the way.*

46. Your affiant believes in the above segment of the conversation, the subjects debated whether or not to use the credit, debit, and/or gift cards they stole from the Victim. **SHERMAN** expressed concerns about leaving a “paper trail” or evidence that they were responsible for the kidnapping. The conversation turned to security cameras and continued as follows (session #0044):

YOUNG: *Nah, [UI] there was a big ass camera behind that building.*

SHERMAN: *Aw, man.*

YOUNG: *But we put him in the boiler room. We took him inside so nobody ain’t see us, or hear. They just seen us walking back there. They don’t know what we did.*

SHERMAN: *Oh, I’m saying, did the camera see my car?*

UM⁶: *Nah, nah.*

YOUNG: *Nah, the car was at MGM, right?*

SHERMAN: *Yeah, I mean that camera for sure, for sure seen that, but--*

⁶ “UM” stands for an unknown male.

YOUNG: *Yeah, bro, if the nigga snitch, all he going to say is the niggas grabbed him from MGM and he met up with other motherfuckers. So, regardless, if he snitch, we might be hit. Fuck it. Fuck him.*

[Break]

SHERMAN: *That MGM shit ain't about nothing like, what the fuck [UI], he walked us in, walked with us, [UI] or nothing...I don't know what happened to you. That nigga be lying.*

YOUNG: *Man, that nigga ain't going to tell, man. Man, y'all took coke and weed from that man, he ain't going to tell nothing... man, the nigga said, he said "bro, just swipe all the cards. I don't care," he said "you got all day, I'm going to call tomorrow and report them stolen."*

SHERMAN: *I ain't no dummy... right now, he could rat on me.*

[Break]

YOUNG: *Man, you can swipe the money off the ATM, at a Wells Fargo ATM.*

47. Your affiant believes in the above described portions of the call, the subjects were worried that they may have been caught on video cameras—both in the location where they held the Victim hostage and at the MGM Casino where they initially met the Victim, and later returned to search the Victim's hotel room. **YOUNG** went so far as to essentially give a full confession by saying, *"But we put him in the boiler room. We took him inside so nobody ain't see us, or hear. They just seen us walking out there. They don't know what we did."* Then the conversation returns to the gift cards. **YOUNG** claimed the victim encouraged the subjects to go forward and steal money off the cards by saying, *"bro, just swipe all the cards. I don't care...you got all day, I'm going to call tomorrow and report them stolen."* The conversation continued as follows (session #0044):

SHERMAN: *...I was just on camera with the nigga, bro. We was just with him. I already took plenty of chances by going back up there in my own shit. That was the point of me calling you, so I won't go up there in my own shit again.*

YOUNG: *Yeah.*

SHERMAN: *Then I'm saying, bro, like, I can beat the fact that if he rats, like, yeah, they, we, he to, he walked us to the room. Walked us out. We just smoked outside, we just walked to my car, we came back in different clothes, you know what I'm saying? We cool. But when you get to swiping the card, that shit going to support his, his, his story, somebody robbed him, 'cause somebody used his cards. You get what I'm saying?*

48. Your affiant believes in this portion of the call, **SHERMAN** worried about going back to the casino in his own car (his own “*shit*”). Then **SHERMAN** tried to convince himself not to worry and suggested that they make up a story to conceal the fact that they had kidnapped the victim (“*He walked us to the room. Walked us out. We just smoked outside, we just walked to my car.*”). The conversation returned to the violence they had inflicted upon the Victim (session #0044):

YOUNG: *Son, that nigga, swear to God, he got smacked with a pistol and all that.*

SHERMAN: *He was fucked up, bro!*

[Break]

YOUNG: *Pain smacked the sense out of his ass.*

SHERMAN: *Man, on my mother, he ain't going to the law, bro...he's fucked up, he's twisted, bro.*

YOUNG: *Man, that nigga say “I'm never fucking with no DC niggas ever again in my life. Fuck no!”*

SHERMAN: *That's what he said?*

YOUNG: *Bro, he look like he was about cry, he meant that shit...*

49. Your affiant believes in the above final portion of the conversation, **YOUNG** and **SHERMAN** talk about the violence inflicted upon the Victim, saying “*He got smacked with a pistol,*” “*Pain* [law enforcement knows “Pain” is a nickname for **HEBRON**] *smacked the sense out of his ass.*” **SHERMAN** referenced the Victim’s injuries, likely his broken nose when he said “*he's fucked up, he's twisted.*” Finally, they talk about how the Victim promised not to go to the police and **YOUNG** remarked “*he was about to cry, he meant that shit.*”

Law Enforcement Recovered Firearm on February 3, 2021

50. On February 3, 2021, at approximately 11:00 a.m., members of the FBI/MPD Safe Streets Task Force were in the area of 46th Street and G Street SE in reference to the possible kidnapping that occurred. Law enforcement observed a black Infiniti Q60S with a temporary Maryland registration number ("black Infiniti") depart the area at a high rate of speed and pass through the stop sign at 46th Street and G Street SE without stopping. Law enforcement attempted to follow the black Infiniti in an attempt to affect a vehicle traffic stop. The black Infiniti continued to elude law enforcement at a high rate of speed.

51. Approximately 10 to 15 minutes later, the black Infiniti was observed entering onto the 600 block of 46th Place SE and come to a stop. The driver and the front passenger exited out of the vehicle. A short time later, surveillance video shows an individual later identified as **PERKINS** walk up to the black Infiniti and place a brown backpack and shopping bag in the front passenger seat area of the black Infiniti. **PERKINS** was observed turning toward the backseat (behind the front passenger seat) of the black Infiniti, bend at the waist, and extend his arm towards the backseat.

52. Law enforcement responded to the scene and detained the driver, front passenger, and **PERKINS**, who were all standing next to the black Infiniti. Law enforcement conducted a drug canine scan of the black Infiniti, and the drug canine gave a positive alert for narcotics in the vicinity of the driver's side door of the black Infiniti.

53. Based on the positive narcotics hit on the black Infiniti, law enforcement searched the black Infiniti. Recovered from the floorboard behind the front passenger seat was a black Glock .45 caliber, model 30, semi-automatic handgun. Recovered from the front passenger side seat of the black Infiniti was a brown backpack. The backpack contained 14 clear sandwich bags

each containing approximately 29 grams of suspected marijuana (406 grams total). The backpack also contained 11 Naloxone films, 17 red Mylar packets, and \$6.66 of US currency. A portion of the suspected marijuana from one of the clear sandwich bags was field tested and produced a positive color reaction to THC, which is the active chemical in marijuana. The firearm was swabbed for DNA.

Law Enforcement Located Foot Path, Boiler Room, and Victim Hotel Room

54. Later the same day, on February 3, 2021, law enforcement went back to the 500 block of 46th Street SE to search for a path through the woods, as was discussed in the above call and confirmed by the Victim. The Victim reported that his assailants had parked in a small parking lot, walked up a steep, wooded hill, went through a cut in the fence, and into a doorway on the rear side of an apartment building. Once law enforcement arrived in the 500 block of 46th Street, SE, they quickly located a footpath, followed it uphill, through a wooded area to the back of the apartment building at 600-604 46th Place, SE. An unlocked door was found a short distance from the fence, which lead to a utility room for the apartment building. The Victim told law enforcement that he was seated on a milk crate while being held in the boiler room. Law enforcement officers found a single milk crate in the utility room of 600-604 46th Place, SE. Also, when law enforcement observed **YOUNG** and **MUP** walk out from between the wood line and 600-604 46th Place, SE, at approximately 10:57 a.m., they were walking from the direction of the same utility/boiler room.

55. The same day (February 3, 2021), law enforcement went with the Victim back to the Victim's room at the MGM Casino. When they arrived at the Victim's room, the Victim said that he had been robbed of approximately \$6,000 in U.S. currency, approximately \$1,500 to \$2,500

in poker chips, marijuana, an Xbox, a backpack, and a suitcase. Law enforcement later swabbed areas of the Victim's hotel room, including the hotel safe, for DNA.

Location of Sherman's Mercedes Benz

56. On February 6, 2021, at approximately 7:42 p.m., law enforcement observed **SHERMAN**'s Mercedes Benz drive into and park in the 600 block of 46th Place, Washington, D.C. An individual fitting the same physical description of **SHERMAN** exited the Mercedes Benz, walked over to and accessed the passenger side door, and then proceeded to walk away from the Mercedes Benz. At approximately 9:27 p.m. that same night, law enforcement seized **SHERMAN**'s Mercedes Benz and transported it to an FBI facility.

57. On February 8, 2021, pursuant to a federal search warrant, law enforcement agents searched **SHERMAN**'s Mercedes Benz. Law enforcement found and seized three black gloves, a black mask, black pants with white stripes, bottles, and tan tennis shoes. The black pants seized from **SHERMAN**'s Mercedes Benz were consistent with the pants **SHERMAN** was wearing at the time of the kidnapping. The shoes seized from **SHERMAN**'s vehicle are consistent with the shoes **SHERMAN** was wearing when he went back to the MGM Casino and robbed the Victim's hotel room. Law enforcement also swabbed **SHERMAN**'s Mercedes Benz and the items found in **SHERMAN**'s Mercedes Benz for DNA.

Search Warrant of MUP's Residence

58. On March 16, 2021, at approximately 6:00 a.m., law enforcement executed a search warrant of **MUP**'s residence in Washington, D.C. **MUP** and one of his close relatives were located inside the residence. A search of the residence recovered the following items of evidence, among others: (1) a black Glock 27, 40 caliber pistol, with a magazine and five rounds of ammunition; (2) a black Kel-tec 9mm pistol, with a magazine and seven rounds of ammunition; (3) a black

Glock 23, 40 caliber pistol, with a magazine and ten rounds of ammunition; (4) an AR style pistol, .223 caliber, with a magazine and twenty-three rounds of ammunition; (5) a Glock 9mm magazine; (6) nine rounds of 9mm ammunition; (7) a clear bag with suspected cocaine; (8) mason jars and bags containing suspected marijuana; and (9) a digital scale. Law enforcement sent all the firearms and firearms related items to the FBI Laboratory to be swabbed for DNA.

Conclusion

59. Based on the foregoing facts, there is probable cause to support the issuance of the requested criminal complaints and arrest warrants.

Respectfully submitted,

Eric Montgomery

Eric Montgomery
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 30th day of March, 2021.

Gina L. Simms

The Honorable Gina L. Simms
United States Magistrate Judge